UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAFAYETTE DIVISION

UNITED STATES OF AMERICA	*	CRIMINAL NO. 6:17-cr-00002
	*	18 U.S.C. § 1343
	*	18 U.S.C. § 1349
VERSUS	*	18 U.S.C. § 981(a)(1)(C)
	*	21 U.S.C. § 2461 (c)
	*	
	*	JUDGE MINALDI
RANDY LEBLANC	*	MAGISTRATE JUDGE WHITEHURST

BILL OF INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
CONSPIRACY TO COMMIT WIRE FRAUD
18 U.S.C. § 1349
18 U.S.C. § 1343

Beginning on or about February, 2011, and continuing to on or about December, 2014, in the Western District of Louisiana, and elsewhere, the defendant, RANDY LEBLANC, and others known and unknown to the United States of America, did knowingly and willfully combine, conspire, confederate, and agree together and with each other to devise a scheme and artifice to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, by transmitting and causing to be transmitted, by means of wire communications, in interstate commerce, any writings, signs, signals, pictures and sounds for the purpose of executing said scheme and artifice to defraud; all in violation of Title 18, United States Code, Sections 1343 and 1349. [18 U.S.C. § 1343, 1349].

Forfeiture Allegation

1. The allegations contained in Count 1 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).]

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 1349, set forth in Count 1 of this Information, the defendant, RANDY LEBLANC, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c). All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

Respectfully submitted,

STEPHANIE A. FINLEY
UNITED STATES ATTORNEY

By: ______________________

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